

REMARKS/ARGUMENTS

Claim Amendments

The Applicant has amended claim 27. Applicant respectfully submits no new matter has been added. Accordingly, claims 27-46 are pending in the application. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

Response to Arguments

In the Response to Arguments, the Examiner states that the managing system in the Wilson reference is equivalent to the Applicant's Management Entity. The Applicant disagrees with the Examiner's argument. The Wilson Managed system does not include Sum-GI manager, SuM-GI Agent nor does the Wilson Managed System include the specific Object Classes such as SubscriptionFunction and ServiceProviderFunction classes.

The Examiner also states that selecting from "a group of Object Classes that includes..." indicates intended use." The Applicant respectfully disagrees with the Examiner's interpretation of the claims that use the "includes" language. The claim states the SuM-GI Data Model comprises any object class and the "includes" limitation points out that at least some specific Object Classes are used individually or in combination to limit the SuM-GI Data Model.

The Applicant respectfully notes that the structure of the Applicant's invention is different from the prior art in that there is an internal data model that is mapped to the SuM-GI manager (a part of the Management Entity) Data Model. As stated in the application "...the SuM-GI Agent (110, 210, 410) can describe its own data model by mapping its internal object classes to those object classes included in the SuM-GI Data Model, so that the SuM-GI Manager (310) does not need be changed each time a new agent is introduced into the management system."

Claim Rejections – 35 U.S.C. § 102(e)

Claims 31, 32, 36, 38-40, 45 and 46 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Wilson (US 2002/0029298). The Applicant respectfully traverses the rejection of these claims.

The Applicant respectfully directs the Examiner's attention to claim 31.

31. excerpt of pertinent limitations:

"...sending provisioning orders from a SuM-GI Manager toward at least one SuM-GI Agent with a number of SuM-GI Operations intended for operating on Object Classes included in a SuM-GI Data Model;

receiving the provisioning orders at a SuM-GI Agent in the Provisioned Node side of at least one Managed entity with a number of SuM-GI Operations operating on Object Classes included in the SuM-GI Data Model; and

mapping in this Provisioned Node side the provisioning order received from the SuM-GI Manager with the SuM-GI Operations operating on Object Classes of the SuM-GI Data Model into a number of internal operations operating on an internal data model supported by the Managed Entity..." (emphasis added)

As disclosed in the Applicant's specification, each network element "...includes a Mapping Module for mapping instances of a generic data model...to an internal data model respectively included in each Provisioned Node." (para. [0066]) As previously noted in the Non-Final Office Action, Wilson does not teach or suggest a mapping module where by a SuM-GI Data model is mapped to an internal data model in a provisioned node.

A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. V. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987) (see also MPEP 2131). The Applicant respectfully asserts that the Wilson reference does not disclose the above emphasized limitations. Wilson broadly discloses a managing system that manages objects via an agent. The Wilson reference does not disclose at least the SuM-Generic Interface Data Model mapping to an internal data model in a provisioned node.

The Applicant also respectfully submits that the claimed object classes are defined object classes well known to one skilled in the art (3GPP TS 32.172 Subscription Management (SuM) Network Resource Model (NRM) Integration Reference Point (IRP): Information Service (IS) (Release 8)). Wilson did not disclose the specific object classes claimed in the independent claims.

With regard to claim 40, the Wilson reference does not disclose or teach operating in accordance with an Integration Reference Point (IRP) specification within an IRP Generic Network Resource Model. Nor, as stated above, does Wilson disclose the specific group of Object classes. So, the above mentioned claim 31 and 40 limitations are not disclosed by the Wilson reference. This being the case, the Applicant respectfully submits that Wilson fails to describe expressly or inherently the above claimed limitations in either claim 31 or 40. The Applicant respectfully requests that claims 31 and 40 be allowed and that the respective dependent claims 32, 36, 38, 45 and 46 be allowed.

Claim Rejections – 35 U.S.C. § 103 (a)

Claims 27, 29, 41, 42, 43 and 44 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Seymour (US Patent # 5,579,384) in view of Wilson (US 2002/0029298). The Applicant respectfully traverses the rejection of these claims.

First, the Applicant is confused. The rejection regarding claim 27, states that "...Seymour taught a Management Entity... supporting a Subscription Management Generic Interface that includes a SuM-GI Data model,..." Then later in the rejection, the Examiner states that Seymour did not explicitly teach a SuM-GI Manager for sending provisioning order to manage subscriptions...wherein the SuM-GI Data Model...." Since the Wilson reference is cited in this rejection for disclosing a manager that manipulates managed objects via an agent and includes mapping between managed objects and resources, the Applicant will assume that the Examiner meant that Seymour did not disclose the limitations allegedly found in Wilson. The Applicant respectfully asserts that neither the Seymour nor Wilson references teach a Subscription Management Generic Interface nor do they teach the use of a SuM-GI Data Model being mapped to an

internal Data Model in a Provisioned Mode. This being the case, the Applicant respectfully requests the allowance of claims 27, 29, 41, 42, 43 and 44.

Claims 28 and 30 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Seymour (US Patent # 5,579,384) and Wilson (PGPub: 2002/0029298) in further view of J.C-K. Lee et al. hereinafter Lee (service Subscription Information Management in a TINA Environment using Object-Oriented Middleware). The Applicant respectfully traverses the rejection of these claims.

Lee is said to teach a subscription that includes an information model formed by objects representing subscription data. As noted previously, Lee does not teach or suggest a way to provide a generic interface for subscription management. As noted above the Subscription Management Generic interface, the SuM-GI Data Model and the internal data model are missing from the Wilson and Seymour references as well as the Lee reference. The Examiner states that using the term "includes" in a claim indicates intended use and this does not require steps or particular structure. As indicated above, "includes" is an equivalent of comprises and merely indicates a group of objects that are specific limitations to be applied.

Lee lacks the same limitations lacking in Wilson and Seymour, therefore, the allowance of claims 28 and 30 is respectfully requested.

Claim 35 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Wilson (PGPub: 2002/0029298) in further view of J.C-K. Lee et al. hereinafter Lee (service Subscription Information Management in a TINA Environment using Object-Oriented Middleware). The Applicant assumes that the Examiner intended to reject claim 35 and the Applicant respectfully traverses the rejection of this claim.

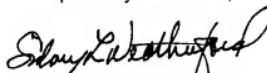
Claim 35 depends from claim 31 and contains the same limitations as claim 31. Lee does not provide the limitations missing from Wilson and Seymour. This being the case, the Applicant respectfully requests the allowance of claim 35.

CONCLUSION

In view of the foregoing remarks, the Applicant believes all of the claims currently pending in the Application to be in a condition for allowance. The Applicant, therefore, respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance for all pending claims.

The Applicant requests a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,



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